

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI**

MEGAN KNIGHT)
Plaintiff)
VS.) Case No. 6:25-cv-3088
THE ARC OF THE OZARKS)
Defendant) TRIAL BY JURY DEMANDED

COMPLAINT

PLAINTIFF, by counsel, sets forth her Complaint against Defendant as follows:

1. This action is brought pursuant to the Americans with Disabilities Act.
2. The events giving rise to this action occurred in Greene County, Missouri, which is within the Western District of Missouri.
3. Defendant is a Missouri nonprofit corporation with its primary location in Greene County, Missouri.
4. Plaintiff was an employee of Defendant between February 2020 and January 2025.
5. On or about January 15, 2025 Defendant terminated Plaintiff's employment.
6. Defendant's Counterpoint Director, Kelly Sikes, terminated Plaintiff's employment on behalf of Defendant.
7. Sikes stated that Defendant was terminated Plaintiff's employment because she had seen court documents about Plaintiff's mental health.
8. Sikes did not show Plaintiff the alleged "court documents" or the allegations they contained.
9. On or about January 21, 2025 Plaintiff's former program supervisor Melissa West, told Plaintiff that her employment had been terminated due to concerns over Plaintiff's mental health.
10. Plaintiff had not informed Defendant of any mental health or mental illness matter.
11. Plaintiff had not authorized any health provider to disclose private health information to Defendant or Defendant's agents.

12. Plaintiff had never been written up or disciplined for her work with Defendant.
13. Plaintiff had not informed Defendant of any mental health problems or mental illnesses of Plaintiff.
14. Plaintiff was fully able to perform her job duties with Defendant.
15. Plaintiff had manifested no behavior that would indicate any mental illness that would impair her ability to perform her job duties.
16. Defendant regarded Plaintiff as having a mental illness or disability.
17. Defendant terminated Plaintiff because Defendant regarded Plaintiff as possessing a mental illness or disability.
18. Defendant had no reasonable or rational basis to believe that Plaintiff suffered from a mental illness that impaired her ability to perform her job duties.
19. As a result of Defendant's actions Plaintiff has been damaged.
20. Defendant knew that its actions were unlawful.
21. Defendant's actions were motivated by malice.
22. On January 28, 2025 Plaintiff filed a charge of discrimination with the EEOC. A true and accurate copy is attached hereto as Exhibit 1 and incorporated herein by reference.
23. On March 6, 2025 the EEOC issued Plaintiff a Notice of Right to Sue. A true and accurate copy is attached hereto as Exhibit 2 and incorporated herein by reference.
24. Plaintiff demands a trial by jury on all matters so triable.

WHEREFORE Plaintiff prays the Court for judgment against Defendant for Plaintiff's damages, for back and front pay, emotional distress, punitive damages, attorney fees, costs, and such other relief as is just and lawful.

LAMPERT LAW OFFICE, LLC

By:/s/ Raymond Lampert

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